Case 1:23-cr-00415-CM Document 53 Filed 03/24/25 Page 1 of 1

Case 1:23-cr-00415-CM Document 52 Filed 03/21/25 Page 1 of 1

U.S. Department of Justice

United States Attorney Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

March 21, 2025

BY ECF

The Honorable Colleen McMahon United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

United States v. Khaim Mavlyanov, 23 Cr. 415 (CM)

Dear Judge McMahon:

PIEH dISCUSSIONS The parties respectfully write to request that the Court set a control date of April 17, 2025 in the above-referenced matter, by which time the parties anticipate having reached a pretrial resolution of the case. The Government also respectfully requests, with the consent of the defendant, that the time between today and April 17, 2025 be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government submits that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the parties to continue discussions regarding pretrial resolution of this matter.

Respectfully submitted,

MATTHEW PODOLSKY Acting United States Attorney

By: Jonathan L. Bodansky Matthew R. Shahabian Assistant United States Attorneys (212) 637-2385 / -1046

James Kousouros, Esq. cc: Boris R. Nektalov, Esq.

> **USDC SDNY** DOCUMENT ELECTRONICALLY FILED DOC #:

DATE FILED:

CHSZ Adj to April 17, 2025
At 4PM - timz excluded

through April 17, in the laterestos

Tusfice, to facilitate